

## **Remarks**

### **Preliminary Matters**

Claims 66-70, 72-74, and 76-83 are presented for reconsideration. Claims 66 and 68 have been amended. Claims 1-65, 71, and 75 have been canceled. Claims 76-83 have been added.

References to paragraph numbers in the Specification are taken from the Official Publication hereof, U.S. Patent Application Publication No. 2005/0138007.

### **Rejections Under 35 U.S.C. § 103**

#### **First Rejection.**

Claims 66-70 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Cole *et al.*, U.S. Patent No. 6,571,239 (Cole) in view of U.S. Patent Application Publication No. 20040078356 by Mazner *et al.* (Mazner).

Applicant has amended independent claim 66 in order to more particularly claim the invention and to define over Cole and Mazner.

As previously noted, Cole provides a method to modify associations between objects in a database and keywords of queries in an index. Cole does not disclose adding queries to the identified documents themselves as metadata. The Examiner has now cited Mazner for adding queries (search terms) to identified documents themselves as metadata (added information).

Mazner discloses a user interface system that allows a user to tag or categorize documents with selections from a list of text strings ("vocabularies"). The user himself manually enters the selections into the system. With optional filtering, the tags facilitate searching of categorized documents that may encompass

large numbers of categories. Fig. 3 illustrates the process. A browser screen presents a drop down box 142 in which the user is presented with a list of word phrases that describe aspects of the document. The user's options appear to be limited to the items in the list, which may have no relationship to the queries recited in claim 66. Claim 66 is limited to adding user queries to documents. Such queries are typically formulated *ad hoc* by users and would not be satisfied by the fixed categories of Mazner.

Moreover, the ability to add the "vocabularies" to a document is only shown to facilitate searching user's own documents. Amended independent claim 66 recites adding queries of a plurality of users to documents. Claim 66 also recites ranking documents identified by a search engine according to frequencies of occurrence of terms of the added queries (by a plurality of users). Mazner is silent on both points. Cole, as noted by the Examiner in the discussion of claim 68, maintains statistical information to indicate the frequency of use of keywords (col. 4, lines 15-30). However this activity only concerns maintenance of the keyword index. Cole states:

"...It often also keeps other statistics, such as the number of sessions associated with keyword(s), to indicate the frequency of use of the keyword. These statistics are subsequently employed to make decisions about whether and how long to keep associations between keywords and data 20 objects either in the master Keyword Index (120) in Alternative A, or in the Auxiliary Index (140) in Alternative B. [emphasis supplied].

Cole does not disclose or suggest ranking identified documents according to keyword frequency in added queries.

Applicant therefore urges that Mazner does not remedy the deficiencies of Cole with respect to amended claim 66 and that claim 66 is patentable over Cole and Mazner.

### **Second Rejection.**

Claim 74 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Cole and Mazner, further in view of Mittal et al., U.S. Patent Application Publication No. 2004/0261021 (Mittal). Claim 74 is believed to be allowable as pending from an allowable base claim.

### **New Claims**

New claims 76-83 are directed to a computer software product, and otherwise claim the same subject material as claims 66-74.

### **Support for Amendments**

The element "ranking the identified documents according to respective frequencies of occurrence of terms of the added queries therein" is supported in paragraph [0035].

In claim 68, the element "wherein enhancing the document index further comprises including therein the respective frequencies of occurrence of terms of the added queries" is supported in paragraphs [0033]-[0035].

### **Concluding Matters**

Dependent claims not specifically mentioned are believed to be allowable as pending from an allowable base claim.

It is believed that the amendments and remarks presented hereinabove are fully responsive to all the grounds of rejection and objections raised by the Examiner, and that the Application is now in order for allowance.

Applicant thanks the Examiner for the thorough consideration of the Application and appreciates the careful analysis of the art cited therein.

Please charge any fees associated with this response to Deposit Account 09-0468.

Respectfully submitted,

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